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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

Master Docket No. 07-m-1827 SI

This Document Relates To:

*Motorola Mobility, Inc. v. AU Optronics
Corporation, et al., C 09-5840 SI*

**STIPULATION AND ~~PROPOSED~~
ORDER FURTHER EXTENDING
PLAINTIFF'S TIME TO MOVE TO
COMPEL AS TO CERTAIN
DISCOVERY**

1 Defendants Chi Mei Corp., Chimei Innolux Corp. (“Chimei Innolux”); Chi Mei
 2 Optoelectronics Corp. USA, Inc.; CMO Japan Co. Ltd.; Nexgen Mediatech, Inc.; Nexgen
 3 Mediatech USA, Inc. (collectively, “Chi Mei”) and Plaintiff Motorola Mobility, Inc. (“Motorola”)
 4 stipulate as follows:

5 WHEREAS Motorola served a set of Requests for Production of Documents on Chimei
 6 Innolux on November 4, 2011 (the “Discovery”);

7 WHEREAS Chimei Innolux provided objections to the Discovery on December 8, 2011;

8 WHEREAS the parties have met and conferred regarding Chimei Innolux’s Objections to
 9 the Discovery;

10 WHEREAS Chimei Innolux has agreed to conduct a reasonable search for, and to
 11 produce, certain categories of documents and communications and other documents for certain
 12 custodians pursuant to agreement of the parties;

13 WHEREAS Chimei Innolux previously agreed to permit Motorola additional time to
 14 move to compel further responses to the Discovery and the Court has entered Orders extending
 15 the motion to compel deadline to April 13, 2012;

16 WHEREAS Chi Mei will require additional time to complete its search and document
 17 production and has agreed to provide Motorola additional time to move to compel to enforce the
 18 parties’ agreement with respect to the Discovery.

19 THEREFORE, Chi Mei and Motorola, by their respective undersigned counsel, stipulate
 20 and agree as follows:

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1 The deadline for Motorola to move to compel compliance with the parties' agreement
2 regarding the Discovery shall be extended to April 30, 2012.

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4 Dated: April 11, 2012

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/s/ Nathaniel J. Wood

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Nexgen Mediatech USA, Inc.*

IT IS SO ORDERED.

Dated: 4/17, 2012



Hon. Susan Illston, United States District Judge

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